



# United States Department of the Interior

NATIONAL PARK SERVICE  
1849 C Street, NW  
Washington, DC 20240

February 20, 2026

Mr. James Parajon  
City Manager  
City of Alexandria, Virginia  
301 King Street  
Alexandria, VA 22314

Dear Mr. Parajon:

On behalf of the United States Department of the Interior and the National Park Service, I am writing to inform you that we will take no action to modify the Consent Judgment Order, Stipulation of Settlement, or Deed which resolved our dispute related to ownership of Waterfront Park in Alexandria, Virginia, which were entered by the district court in United States v. Bryant, Inc., No. 73-2211 (D.D.C. Oct. 19, 1981).

As you know, in 1981, the City of Alexandria resolved a property boundary and land ownership dispute with the U.S. Department of Justice, who acted on behalf of the Department of the Interior and the National Park Service.<sup>1</sup> The 1981 Settlement established the property interests of both parties in certain parcels along the Potomac River, including land in Alexandria now known as “Waterfront Park.”<sup>2</sup> The Consent Judgment Order by the U.S. District Court for the District of Columbia incorporates by reference a Stipulation of Settlement between the United States and the City of Alexandria, and a Deed covering the subject land (hereafter, collectively, “the 1981 Settlement”).<sup>3</sup>

The 1981 Settlement granted Alexandria fee simple title to Waterfront Park, subject to an estate, interest and scenic easement in gross retained and currently held by the United States.<sup>4</sup> The 1981 Settlement imposed restrictions on the uses of Waterfront Park. Specifically, the parties agreed, and the Judge decreed, that Waterfront Park would remain “an open space public park area” in perpetuity with only specifically permissible uses authorized. The authorized uses all relate to park activities and are limited to: “pedestrian walkways, bicycle trails, seating, landscaped areas, fountains, gardens, play areas, plazas, and temporary facilities for special events.”<sup>5</sup> No other uses were authorized or permitted. The deed also specified that all of Waterfront Park “shall be and remain accessible to the public, and any and all facilities located on [it] shall be open to the public.”<sup>6</sup> The deed also imposed a 15-foot height restriction on any park-related buildings or structures erected in the park. These rights, limitations, and obligations are binding on the City and its successors and assigns, and run with the land as covenants in perpetuity.<sup>7</sup>

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<sup>1</sup> Consent Judgment Order, *United States v. Bryant, Inc.*, No. 73-2211 (D.D.C. Oct. 19, 1981).

<sup>2</sup> One of the parcels subject to the 1981 Settlement documents is “Parcel B,” which covers the area known today as “Waterfront Park” located between Prince and King Streets along the Potomac River. Deed, 1 (Oct. 7, 1981).

<sup>3</sup> See Consent Judgment Order, *supra* note 1, at 1, 7–8 (“Further ORDERED, ADJUDGED and DECREED that the United States of America and the City of Alexandria, Virginia, *shall comply* with the terms of the aforesaid Stipulation of Settlement and Deed . . . .” (emphasis added)).

<sup>4</sup> See Deed, *supra* note 2, at 10–12.

<sup>5</sup> See *id.* at 11.

<sup>6</sup> *Id.*

<sup>7</sup> See Deed, *supra* note 2, at 11.

Alexandria’s proposal to construct a stormwater Pump Station in Waterfront Park would, if approved, permanently remove a large portion of the property from permissible park uses and convert it to impermissible uses. The proposed Pump Station could also negatively impact the remaining portions of this public waterfront park. Most critically, construction of a Pump Station is prohibited under the deed use restrictions summarized above, agreed to by the parties, and entered into law by the district court.<sup>8</sup>

As noted above, the Department of the Interior and the National Park Service do not consent to any modification of the 1981 Settlement, or any of its incorporated documents including the Consent Judgement Order, Stipulation of Settlement, or Deed. Any further questions should be directed to the United States Department of the Interior, Office of the Solicitor.

Sincerely,

Jessica Bowron  
Comptroller, Exercising the Delegated Authority of the Director  
National Park Service

cc: Mr. Matthew Landes  
Portfolio Manager/Division Chief  
Department of Project Implementation  
City of Alexandria, Virginia

Ms. Tammy Stidham  
Associate Regional Director for Lands and Planning  
Interior Region 1, National Capital  
National Park Service

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<sup>8</sup> See Consent Judgment Order, *supra* note 1, at 1, 7–8 (“Further ORDERED, ADJUDGED and DECREED that the United States of America and the City of Alexandria, Virginia, *shall comply* with the terms of the aforesaid Stipulation of Settlement and Deed . . . .” (emphasis added)); *see also* Stipulation of Settlement ¶ 2 (Oct. 7, 1981); Deed, *supra* note 2, at 3.